

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE SUNDIAL GROWERS INC.
SECURITIES LITIGATION

File No. 1:19-cv-08913-ALC

This Document Relates To:
All Actions

**NOTICE OF MOTION FOR ENTRY OF ORDER PRELIMINARILY
APPROVING SETTLEMENT AND ESTABLISHING NOTICE PROCEDURES**

PLEASE TAKE NOTICE that Lead Plaintiffs 0998735 BC LTD and David Draiman (“Plaintiffs”), individually and on behalf of all others similarly situated, will hereby move this Court on a date and at such time as may be designated by the Honorable Andrew L. Carter, Jr., United States District Judge of the United States District Court for the Southern District of New York, 40 Foley Square, New York, New York 10017 for entry of an Order: (1) preliminarily certifying the Settlement Class for the purposes of settlement; (2) preliminarily approving the terms of the Settlement as set forth in the Stipulation of Settlement (“Stipulation”), filed concurrently herewith; (3) approving the form and method for providing notice of the Settlement; and (4) scheduling a Settlement Approval Hearing and deadlines for mailing and publication of the Notice, the filing of Settlement Class Member objections, the filing of Settlement Class Member opt-out notices, the filing of Plaintiffs’ motion for Final Approval of the Settlement, and the filing of Lead Counsel’s application for attorneys’ fees and expenses.

Dated: December 3, 2021

Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

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***Co-Lead Counsel for Plaintiffs and the
Class***

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of December, 2021, I served a true and accurate copy of the foregoing by electronic mail upon all counsel of record.

Leah Heifetz-Li
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